

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

LISA BIRON

V.

UNITED STATES OF AMERICA

)
)
)
)
)
)
)
)

Case No. 1:16-CV-00108-PB

STATUS REPORT

NOW COMES the Movant, Lisa Biron, by and through her counsel, Wilson, Bush, Durkin & Keefe, P.C. (“the Defendant”), and submits the following Status Report:

1. On March 23, 2016, the Defendant through her counsel filed a Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by Person in Federal Custody, along with an Assented-to Motion to Stay Proceedings Pursuant to a Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by Person in Federal Custody.

2. The Motion to Stay requested that the Court stay this matter for 120 days so that counsel could obtain discovery, conduct an investigation, and to be able to supplement the record in this matter during that time pursuant to his investigation.

3. The 120-day stay will expire on or about June 23, 2016.

4. On June 7, 2016, counsel for the Defendant received the requested discovery from the United States Attorney’s Office. There are approximately 1,562 pages of discovery for defense counsel to review.

5. On June 10, 2016, the Court granted the stay and ordered the Defendant to file a Status Report this date.

6. Counsel for the Petition has reviewed all of the voluminous discovery materials provided by the government, and he has engaged the services of an investigator to conduct follow-up investigation in this matter. That investigator has been diligently conducting his investigation, but due to the location and cooperation of various witnesses, he has not yet completed his investigation. It is expected that the investigation will be completed by the end of December 2016.

Respectfully submitted,

Lisa Biron
By and through her counsel,

/s/Charles J. Keefe
Charles J. Keefe (N.H. Bar No. 14209)
Wilson, Bush & Keefe, P.C.
378 Main Street
Nashua, NH 03060
(603) 595-0007
keefe@wbdklaw.com

Certificate of Service

I, Charles J. Keefe, hereby certify that on December 8, 2016, true copies of the above document were served upon AUSA Seth Aframe of the United States Attorney's Office for the District of New Hampshire by ECF.

/s/Charles J. Keefe
Charles J. Keefe